



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 24, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Accepted / Filed**

**JUN 24 2015**

Federal Communications Commission  
Office of the Secretary

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Mount Horeb Telephone Company  
Study Area Code 330916**

Dear Ms. Dortch:

On behalf of Mount Horeb Telephone Company ("Mount Horeb"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Mount Horeb seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd  
List ABCDE

0+3

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200  
9430 Research Blvd., Austin, TX 78759  
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve, Eagan, MN 55121  
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road  
Bldg. B-3, Suite 200, Atlanta, GA 30328  
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane  
Bountiful, UT 84010  
phone: 801-294-4576, fax: 801-294-5124



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Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Federal Communications Commission  
Office of the Secretary

Re: **WC Docket No. 14-58**  
**2015 ETC Annual Report of Mount Horeb Telephone Company**  
**Study Area Code 330916**  
**Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Mount Horeb Telephone Company ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

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4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

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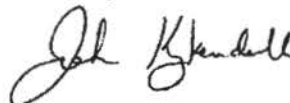
<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)



FCC Form 487 - Carrier Annual Reporting		FCC Form 487 - Carrier Annual Reporting	
Reporting Period: 12/1/2015 - 11/30/2016		Reporting Period: 12/1/2015 - 11/30/2016	

**Accepted / Filed**

<010> Study Area Code 330916

<015> Study Area Name MOUNT HOREB TEL CO

<020> Program Year 2016 JUN 24 2015

<030> Contact Name: Person USAC should contact with questions about this data John Klarer

<035> Contact Telephone Number: 6084375551 ext. Number of the person identified in data line <030>

<039> Contact Email Address: john.klarer@mhtcinc.com Email of the person identified in data line <030>

**Federal Communications Commission  
Office of the Secretary**

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> -- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice) 0		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband) 0		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile 0.0		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed 0.0		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile 0.0		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 330916w1510.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 330916w1610.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	330916
<015> Study Area Name	MOUNT MOREL TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	John Klarer
<035> Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

<110> Has your company received its ETC certification from the FCC? (yes / no) ☐ ☒

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5  
<111> year plan" filed with the FCC? (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

330916w1112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets

<114> Report how much universal service (USF) support was received

<115> How much (USF) was used to improve service quality and how support was used to improve service quality

<116> How much (USF) was used to improve service coverage and how support was used to improve service coverage

<117> How much (USF) was used to improve service capacity and how support was used to improve service capacity

<118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable





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(700) Free Offerings including rates used  
Data Collection Form

<010> Study Area Code 330916

<015> Study Area Name MOUNT MORES TEL CO

<020> Program Year 2016

<030> Contact Name - Person USAC should contact regarding this data John Klaser

<035> Contact Telephone Number - Number of person identified in data line <030> 6084375551 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> john.klaser@mtcinc.com

1/1/2015

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

State	Exchange (ILEC)	SAC (CEIC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fee



**Data Collection Form**

11

CONFIDENTIAL - SECURITY INFORMATION

100

<010>	Study Area Code	330916
<015>	Study Area Name	MOUNT HOREB TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Klarer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

&lt;711&gt;

[illegible]

Control No. 3060-0819

[illegible]



3080-8819

<910> Tribal Land(s) on which ETC Serves

**<920> Tribal Government Engagement Obligation**

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

[illegible]

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

OMB Control No. 3060-0813

<010>	Study Area Code	330916
<015>	Study Area Name	MOUNT HOREB TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Klarer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).



**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

<010>	Study Area Code	330916
<015>	Study Area Name	MOUNT HOREB TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Klarer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

330916w11210.pdf

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2006) Price Cap Carrier Additional Documentation

Data Collection Form

Including Note of Return Contents attached with Price Cap Carrier Documentation

<010>	Study Area Code	
<015>	Study Area Name	330916
<020>	Program Year	MOON HARBOR TEL CO
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	John Klarer
<039>	Contact Email Address - Email Address of person identified in data line <030>	8084375551 ext. john.klarer@mtcinc.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)(i))
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)(ii))
- <2011b> Attachment (47 CFR § 54.313(b)(1)(ii))

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information



CHECK the boxes below to attest compliance on its five year service quality plan (pursuant to 47 CFR § 54.325(c)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.317(b)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

CFR § 34.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Name of Attached Document	Document Listing	Required Information

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (X)(VI), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information	(Yes/No)	(Yes/No)
--	----------	----------

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

Name of Attached Document Listing Required Information	(Yes/No)
--	----------

(3018) If the response is no on line 3014, is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(N)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3025, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

(3023) Underlying information subjected to a review by an independent certified public accountant

(3024) Underlying information subjected to an officer certification.

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

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(3000) State Of Arizona Current Addressed Information

Data Collection Form

<010>	Study Area Code	330916
<015>	Study Area Name	MOUNT MOREB TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Klarer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6024375551 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhinc.com

## Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends





<010> Study Area Code	330916
<015> Study Area Name	MOUNT HOREB TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	John Klarer
<035> Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<010> Study Area Code	330916
<015> Study Area Name	MOUNT HOREB TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	John Klarer
<035> Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	MOUNT HOREB TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/23/2015
Printed name of Authorized Officer:	John Klarer
Title or position of Authorized Officer:	Secretary & General Manager
Telephone number of Authorized Officer:	6084375551 ext.
Study Area Code of Reporting Carrier:	330916 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	MOUNT HOREB TEL CO
Name of Authorized Agent or Employee of Agent:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/23/2015
Printed name of Authorized Agent or Employee of Agent:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	330916 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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## Attachments



**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

**Mount Horeb Telephone Company's Demonstration of Compliance with  
Applicable Service Quality Standards and Consumer Protection Rules**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."<sup>2</sup> The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."<sup>4</sup>

Mount Horeb Telephone Company ("Company") hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. Mount Horeb Telephone Company complies with applicable service quality standards for telecommunications providers in the Wisconsin State Statutes (§§100.207 and .208) regulating, advertising, sales and collections practices, and as applicable, those of the Public Service Commission of Wisconsin in the Wisconsin Administrative Code (*Ch. PSC 165*), regarding Standards for Telecommunications Service.

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

Mount Horeb Telephone Company complies with consumer protection requirements including those found in federal Customer Proprietary Network Information (*CPNI*; *WC Docket No. 04-36*), those of the Wisconsin Department of Agriculture, Trade and Consumer Protection (*Ch. ATC 123*) covering appropriate subscription and billing practices and (*Ch. ATC 127*) covering appropriate direct marketing practices. Mount Horeb Telephone Company certifies it has complied with these requirements and will continue to comply with these requirements.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.



## **Mount Horeb Telephone Company's Demonstration of Ability to Function in Emergency Situations**

The Company hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).<sup>1</sup> The Company's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company adheres to state requirements that it makes reasonable provision to function in emergencies, and the Company trains its employees on the procedures to be followed in the event of an emergency in order to mitigate interruption or impairment of service (PSC 165.065). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup and generator backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators installed at all Central Office locations will continue to run as long as the Company has access to fuel.

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

(700) Price offerings including those made over  
Data Collection form

330916

MOUNT HOREB TEL CO

2016

**John Klarer**

6084375551 ext.

John K. Edwards, Jr. com

1/1/2015

1000

[illegible]

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(710) Broadband Price Offerings  
Data Collection Form

**File Number:** \_\_\_\_\_  
**Date Generated:** \_\_\_\_\_ **Form ID:** \_\_\_\_\_ **Conf No.** 3060-0819  
**Page 2 of 2**

<010>	Study Area Code	330916
<015>	Study Area Name	MOUNT HOREB TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Klarer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com

&lt;711&gt;

[illegible]



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(800) Operating Companies  
Data Collection Form

This form was approved by the Board of Directors on 06/06/19  
JUL 2019

<010>	Study Area Code	330916
<015>	Study Area Name	MOUNT HOREB TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	John Klarer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6084375551 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	john.klarer@mhtcinc.com
<810>	Reporting Carrier	Mount Horeb Telephone Company
<811>	Holding Company	Mount Horeb Telephone Company
<812>	Operating Company	Mount Horeb Telephone Company

[illegible]

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN  
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	4
Amendment Number:	601

MOUNT HOREB TELEPHONE COMPANY

Utility Name

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE

A. DESCRIPTION

1. Lifeline Service is a residence service offering that provides a discounted monthly rate to Customers who qualify for low income assistance programs as defined in s. PSC 160.02(8), Wis. Adm. Code.
2. Lifeline Service provides a monthly discount to eligible residence Customers that have a network access line (including Extended Area Service), touch-tone service, 911 Service (billed on the Customer's telephone bill), and the End User Common Line Charge (EUCL). If the Customer has measured service, 120 local calls are provided. Extended Community Calling (ECC) Service is not included in Lifeline Service.
3. Lifeline Service monthly rates for residence Customers are established according to s. PSC 160.062(1), (2) and (3), Wis. Adm. Code.

B. REGULATIONS

1. Lifeline Service is only available for residence Customers with a single line network access line.
2. Lifeline Service is not available to Customers who are dependents for federal income tax purposes as defined in 26 USC 152 (1986), unless the Customer is more than 60 years old.
3. Lifeline Service Customers must complete and remit any required query authorization forms requested by the Company or forfeit eligibility for Lifeline Service.

Applicable to Service Rendered on and after: January 1, 2007

Date Issued

PSCW Authorization by Order No.: 3940-TI-103

Letter Date

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN  
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	5
Amendment Number:	601

MOUNT HOREB TELEPHONE COMPANY

Utility Name

## EXCHANGE ACCESS SERVICES

## LIFELINE SERVICE (Cont'd)

## B. REGULATIONS (Cont'd)

4. Eligibility for Lifeline Service must be verified by the Company by finding the Social Security Number and name of the listed Customer in active records of the Department of Workforce Development or the Wisconsin Department of Revenue.
5. Reconfirmation of Eligibility for Lifeline Service
  - a. Reconfirmation of eligibility for Lifeline Service will be done at least once each year.
  - b. If a Customer cannot reconfirm eligibility for Lifeline Service, eligibility will continue until the next bill date following failure to meet the eligibility requirements.
  - c. When the Low Income Household Energy Assistance Program is one of the Customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next December following the close of the heating season. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the Customers bill.
  - d. When the Wisconsin Homestead Tax Credit is one of the Customer's qualifying low income assistance programs, the eligibility for Lifeline Service shall continue until the bill date in the next June following the end of the tax year. At that time, if eligibility cannot be re-verified by the Company, Lifeline Service will be removed from the Customers bill.

Applicable to Service Rendered on and after: January 1, 2007

Date Issued

PSCW Authorization by Order No.: 3940-TI-103

Letter Date



Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN  
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	6
Amendment Number:	611

MOUNT HOREB TELEPHONE COMPANY  
Utility Name

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

B. REGULATIONS (Cont'd)

6. Lifeline Service will appear as a credit or rate reduction on the Customer's bill on the next bill date following the date the Customer applied for Lifeline Service. When the Customer's eligibility precedes the previous bill, credit will also be given on one month's prior bill.
7. A Lifeline Service Customer cannot be disconnected for the non-payment of toll charges.
8. If Call Blocking Service is available and the Customer has elected Call Blocking Service, a Service Deposit cannot be collected to establish Lifeline Service. If Call Blocking Service is not available, the Company may require a Service Deposit to establish Lifeline Service.
9. All long distance charges (toll charges) are the responsibility of the Customer.
10. Local Minutes of use are unlimited.

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ii Applicable to Service Rendered on and after: June 17, 2013

Date Issued

PSCW Authorization by Order No.: 3940-TI-103

Letter Date

Form 10 Rate

PUBLIC SERVICE COMMISSION OF WISCONSIN  
TELEPHONE RATE FILE

Exchange:	ALL
Section Number:	4
Sheet Number:	7
Amendment Number:	611

MOUNT HOREB TELEPHONE COMPANY

Utility Name

EXCHANGE ACCESS SERVICES

LIFELINE SERVICE (Cont'd)

C. RATES AND CHARGES

The applicable monthly rate for Lifeline Service is determined by the sum of the rates for the services specified in 1. following and applying a credit based on the sum of the credits as specified in 2. following.

1. Lifeline Service

Residence Network Access Line (including EAS) at the rate specified elsewhere in this tariff.

Touch Calling Service (if applicable) at the rate specified elsewhere in this tariff.

911 Service (if billed on the Customer's telephone number).

Subscriber Line Charge (SLC).

2. Lifeline Service Credits

Subscriber Line Charge (SLC) as specified in the NECA Tariff.

Federal Lifeline support credit as specified by the Federal Communications Commission (FCC) for Universal Service Support for Low-Income Consumers.

3. Lifeline Service Monthly Credit

The Lifeline Service monthly credit is \$9.25.

D

Applicable to Service Rendered on and after: JUNE 17 2013

Date Issued

PSCW Authorization by Order No.: 3940-TI-103

Letter Date

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**Mount Horeb Telephone Company (SAC 330916)**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Mount Horeb Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

**Mount Horeb Telephone Company (SAC 330916)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

MHTC did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

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**ATTACHMENT - LINE 3026**

**ATTACHMENT REDACTED IN ENTIRETY**